

Honorable Judge Benjamin H. Settle  
Honorable Judge David W. Christel

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JESUS CHAVEZ FLORES,

Plaintiff,

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT, et al,

Defendants.

No. 3:18-cv-05139-BHS-DWC

DECLARATION OF THERESA M.  
DEMONTE IN SUPPORT OF  
PLAINTIFF'S REPLY TO ICE  
DEFENDANTS' RESPONSE TO  
MOTION SEEKING LEAVE TO  
FILE THIRD AMENDED  
COMPLAINT

RE-NOTED FOR: November 2, 2018

I, THERESA M. DEMONTE, declare under penalty of perjury of the laws of the State of Washington that the following statements are true and correct and based upon my personal knowledge:

1. I am one of the attorneys of record for Plaintiff Jesus Chavez Flores in the above-captioned matter and am competent to testify to the matters set forth herein.

2. On June 8, 2018, GEO Defendants were served with Mr. Chavez's First Set of Interrogatories and Requests for Production.

3. As of today, November 2, 2018, complete responses have not been received and counsel for GEO Defendants and counsel for Mr. Chavez have been

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1 attempting to schedule a meet-and-confer with counsel for GEO Defendants.

2 DATED this 2nd day of November, 2018., at Seattle, Washington.

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4 By: s/ Theresa M. DeMonte  
Theresa M. DeMonte, WSBA No. 43994  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 2, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record who receives CM/ECF notification.

DATED this 2nd day of November, 2018.

By: s/Theresa M. DeMonte  
Theresa M. DeMonte, WSBA No. 43994